

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of	)	
	)	
Acceleration of Broadband Deployment	)	WC Docket No. 11-59
Expanding the Reach and Reducing the Cost of	)	
Broadband Deployment by Improving Policies	)	
Regarding Public Rights of Way and Wireless	)	
Facilities Siting	)	

**CITY OF BOTHELL, WASHINGTON REPLY TO COMMENTS OF THE OF PCIA –  
THE WIRELESS INFRASTRUCTURE ASSOCIATION AND THE DAS FORUM (A  
MEMBERSHIP SECTION OF PCIA)**

The City of Bothell, Washington, files this reply in response to the comments made by the Wireless Infrastructure Association (“WIA”) as part of the Notice of Inquiry (“NOI”), released April 7, 2011, in the above-entitled proceeding. WIA’s allegations that the City of Bothell uses “obstructionists” and/or problematic consultants are baseless, inflammatory, and completely without merit.

In the past fourteen years, the City of Bothell has contracted with outside consultants on only two occasions. Both times, the City used outside consultants to serve as inspectors for large projects. The City lacked the human resources to inspect the projects within the desired timeline of the broadband providers, so rather than delay the deployment of additional broadband services, the City used outside consultants in order to help broadband companies complete installation in the most time-efficient manner.

First, in 1998, Pacific Fiber Link was installing a 24-duct bank throughout the City, which, according to David Phelps, an engineer for the City for the past 14 years, was an

enormous project. At that time, the City simply did not have the staffing to inspect the installation, so the City hired Entranco, an engineering firm that is no longer in existence, as a consultant inspector. Had the City refused to obtain assistance from an outside source, Pacific Fiber Link would have experienced significant delays in the installation of their broadband network. Because the City supports the installation and use of such networks, the City took reasonable measures to assist in facilitating the most time-efficient completion possible.


On the other occasion, Verizon undertook a large-scale installation project that began in 2005 and lasted until 2009. At the peak of the construction activity, Verizon had 18 directional boring rigs operating at the same time throughout the City and was seeking inspection of all the construction sites each day. As before, the City did not have the staffing to inspect the project sites per Verizon's wishes, so the City hired Gray & Osbourne as a consultant inspector. The additional inspectors prevented Verizon from experiencing incredible delay and allowed Verizon to remain compliant with its franchise agreement with the City. Without the additional inspectors, the project would likely have dragged on for several more years, and the costs associated with the project would have skyrocketed.

## **CONCLUSION**

Contrary to the WIA's disingenuous and inflammatory comments, the City of Bothell does not contract with "obstructionists" or other problematic consultants. In an effort to allow broadband to expand throughout the City of Bothell, the City has, on only two occasions within the past fourteen years, used outside consultants as inspectors in order to facilitate the most time-efficient installation of broadband services throughout the City. The City's practices do not impede broadband deployment: in fact, they encourage it. As indicated in the original comment, the City of Bothell's policies and procedures are designed to protect important local interests and

have done so for many years. Therefore, the City of Bothell, WA respectfully requests that the Commission disregard the exaggerated comments filed by the WIA.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Steve Anderson', is written over a horizontal line.

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